

Procter & Gamble

The Procter & Gamble Company
Winton Hill Technical Center
6071 Center Hill Avenue, Cincinnati, Ohio 45224-1703

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March 3, 2000

Docket Management Office
5630 Fisher's Lane
Rockville, MD 20852

Dear Madam:

We wish to submit the enclosed report and cover letter entitled "Consumer Research on Olestra Interim Label" to the olestra docket #00F-0792 so that it is publicly available. This report was previously submitted to Mary Ditto of FDA's Office of Pre-market Approval on July 22, 1999.

Please let me know if you have any questions (513-634-6808).

Thank you.

Sincerely,

THE PROCTER & GAMBLE COMPANY



Greg Allgood, Ph.D.
Associate Director
Regulatory & Clinical Development

00F-0792

RPTH

CONSUMER RESEARCH ON OLESTRA LABELING

The Procter & Gamble Company

July 22, 1999

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CONSUMER RESEARCH ON OLESTRA LABELING

July 22, 1999

1. INTRODUCTION AND SUMMARY

This report provides the results of consumer research studies conducted by The Procter & Gamble Company (P&G). The data presented in the report are from consumer research studies conducted during 1998 and 1999 to (1) determine consumer awareness of olestra and concern regarding potential gastrointestinal (GI) effects, and (2) assess consumer perceptions of current and alternative olestra label statements.

Results of these six studies support the following overall conclusions:

- (1) The majority of consumers (68%) are aware of olestra, and 71% of these are concerned that olestra snacks might cause diarrhea, cramping, or other digestive changes.
- (2) All alternative labels tested resulted in a significant proportion of consumers who believed the product was not safe, and that they would expect to experience one or more GI effects from eating olestra snacks.

The qualitative and quantitative consumer research conducted since 1996 on olestra labeling supports the conclusion that any GI information label on olestra snacks is misleading because special labeling on olestra snacks suggests to consumers they are being warned that olestra is not safe. Accurate and truthful consumer perception of the safety of olestra snacks is not likely to be achieved when olestra snacks carry a GI information label - the two conditions are conflicting and thus are mutually exclusive.

- (3) Asterisking the vitamins in the ingredient statement and removing the "other nutrients" language significantly improves consumers' understanding of vitamin and nutrient interactions related to eating olestra.
- (4) The current olestra label is misleading both when it is boxed and not boxed.

These conclusions are consistent with consumer research data submitted by P&G to the FDA on April 1, 1996 and on April 22, 1999.

2. CONSUMER AWARENESS

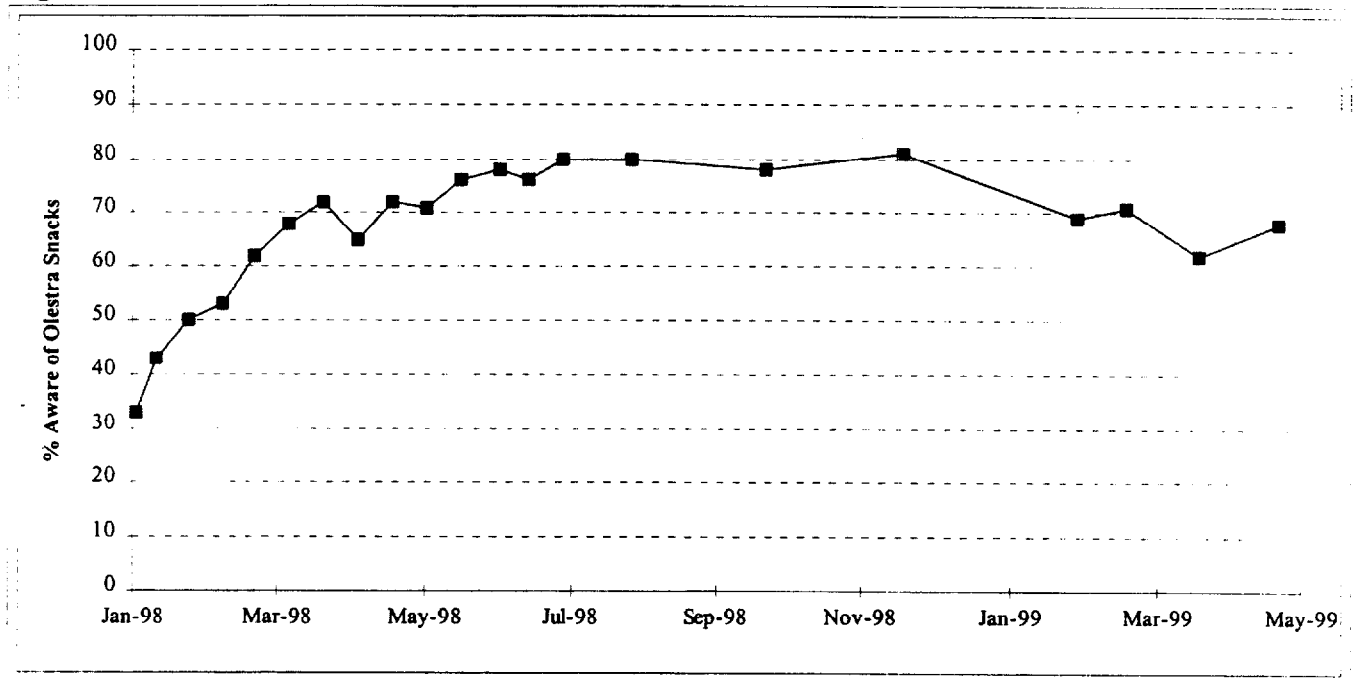
Background:

The purpose of this research was to track consumer awareness and attitudes toward olestra. Quantitative tracking research via telephone surveys conducted by trained interviewers was conducted on a regular basis since January 1998. Details of this study are presented in Appendix 1.

Results:

Results from this study are in Figure 1 and Table 1. Data from the National Olestra Attitude Tracking Study shows high consumer awareness for olestra snacks (% of consumers who have ever seen or heard of olestra snacks). Following national introduction, consumer awareness rapidly increased with heavy promotion and advertising of olestra snacks, and awareness peaked in the 80% range during the period of 7/98-12/98 with the introduction of Pringles Fat-Free snack crisps containing olestra. Typical of product awareness curves, olestra snacks awareness decreased and then leveled off in the 70% range as manufacturers of olestra snacks reduced advertising and promotion of these products once product launches were complete.

Figure 1: National Awareness of Olestra Snacks



Data from the National Olestra Attitude Tracking Study show that 71% are concerned that olestra snacks might cause diarrhea, cramping, or other digestive symptoms (among those aware of olestra snacks).

Table 1: National Olestra Attitude Tracking Study

Total aware of olestra snacks (base size = 114)

% Concerned olestra snacks might cause diarrhea, cramping,
or other digestive changes

Very Concerned 35%

Somewhat Concerned 36%

Very + Somewhat Concerned 71%

Conclusions:

The majority of consumers are already aware of olestra snacks, and 71% of these are concerned that olestra snacks might cause diarrhea, cramping, or other digestive changes.

3. DEVELOPMENT AND TESTING OF ALTERNATIVE LABELS

The objective of testing alternative olestra labels was to determine if label wording could be developed to convey truthful and non-misleading information about olestra snacks to consumers. Phase 1 of testing was conducted to explore the safety perception of a wide range of individual GI statements covering a variety of approaches for conveying GI information to consumers. During Phase 2 of testing, results from the exploratory testing (Phase 1) were used to develop olestra labels with alternative GI language which were tested more extensively with consumers.

- **Phase 1: Exploratory GI Statement Testing**

Background:

Exploratory quantitative research was conducted to assess the consumer perception of the safety of olestra snacks after viewing each of twenty alternative GI statements. Details of this study are presented in Appendix 2.

A wide range of individual GI statements were developed to gain a broad understanding of the message these statements give to consumers regarding the safety of products containing olestra. Some statements were consistent with the olestra clinical GI database and some statements were not consistent. After reading each GI statement, consumers were asked to indicate how safe they thought snacks containing olestra would be. Vitamin and nutrient language was not included in any of the label statements in Phase 1 to keep the focus of the research on GI information only.

Twenty GI statements were developed based on several different approaches (see below) for communicating GI information to consumers. Several GI statements were developed for each approach.

Approaches for GI Statements:

- A. Providing a familiar frame of reference for potential GI symptoms
- B. Reassuring that GI symptoms will not likely occur
- C. Generalized GI symptom information (not mentioning specific symptoms)
- D. Current label GI symptom information
- E. Adding context to qualify/describe GI symptoms

While the list of twenty GI statements tested does not encompass every possible GI statement which might be constructed, the broad range of approaches covered in this testing provides a comprehensive picture of the major principles/approaches for conveying GI information to consumers.

Consumers rated each of the twenty different GI statements for the degree of safety they perceived from the label wording. For each statement, the perceived safety of olestra snacks was rated on a scale from 1 to 9, where 1 is "not at all safe" and 9 is "very safe." Average safety

rated on a scale from 1 to 9, where 1 is "not at all safe" and 9 is "very safe." Average safety rating was calculated for each label statement (the average of all respondent ratings for each statement) to rank order the individual GI statements.

Results:

Results from this study are shown in Table 2. Label statements were subjectively divided into three tiers based upon average safety ratings. Label statements with an average safety rating above 5.5 out of a maximum 9 are in the top tier of ratings, statements with an average safety rating between 4.5 and 5.5 are in the middle tier and statements with an average safety rating below 4.5 are in the bottom tier.

Table 2: GI Label Statement Ratings

	(base size - 199)	Average Safety Rating*	
1	Snacks containing olestra can be consumed the same way regular snacks are consumed without experiencing digestive changes	6.8	<i>Top Tier</i> > 5.5
2	Under normal eating conditions consumption of olestra will not cause digestive changes	6.2	
3	Consumption of olestra may cause digestive changes for less than 2% of people	5.9	
4	Digestive changes from olestra are similar to those experienced with other foods	5.7	
5	The vast majority of people will not have digestive changes from consumption of olestra	5.7	
6	Consumption of olestra may cause digestive changes similar to those experienced from eating high fiber foods	5.6	
7	As with high fiber foods, consumption of olestra may cause digestive changes	5.3	<i>Middle Tier</i> 4.5 - 5.
8	Consumption of olestra may cause digestive changes. Any changes are mild	5.3	
9	Consumption of olestra may cause digestive changes for some people	5.1	
10	Consumption of olestra may cause digestive changes. Any changes are temporary	5.1	
11	Consumption of olestra may cause a stool softening effect	5.0	
12	Consumption of olestra may cause changes in stool consistency	4.5	
13	Consumption of olestra may cause digestive changes	4.5	
14	Consumption of olestra may cause more frequent bowel movements	4.5	
15	Consumption of olestra may cause digestive symptoms	4.4	<i>Bottom Tier</i> < 4.5
16	Excess consumption of olestra may cause digestive changes	4.2	
17	Consumption of olestra may cause loose stools**	4.2	
18	Consumption of olestra may cause digestive effects	4.1	
19	Consumption of olestra may cause a laxative effect	4.1	
20	Consumption of olestra may cause abdominal cramping**	3.8	

*Scale from 1 - 9, where 1 = not at all safe; 9 = very safe

**Label wording included in current olestra label

Approach A: Providing a familiar frame of reference for potential GI symptoms (e.g., Statements # 1, 4, 6, 7)

- * GI statements which provided a familiar frame of reference for GI symptoms rated in the top tier: eat like regular snacks without experiencing digestive changes (#1, average rating 6.8), digestive changes similar to other foods (#4, average rating 5.7), digestive changes like those from high fiber foods (#6, average rating 5.6), as with high fiber foods (#7, average rating 5.3).

Approach B: Reassuring that GI symptoms will not likely occur (e.g., Statements #2, 3, 5)

- * GI statements that reassured GI symptoms would not likely occur also rated in the top tier: under normal eating conditions will not have digestive changes (#2, average rating 6.2), less than 2% of people will have digestive changes (#3, average rating 5.9), vast majority will not have digestive changes (#5, average rating 5.7).

Approach C: Generalized GI symptom information (not mentioning specific symptoms) (e.g., Statement #13)

- * Generalized GI symptom information (Approach C) like digestive changes (#13, average rating 4.5) tended to result in a greater perception of safety than some specific GI symptom language (Approach D) such as loose stools (#17, average rating 4.2), laxative effect (#19, average rating 4.1), abdominal cramping (#20, average rating 3.8), but not for others such as stool softening effect (#11, average rating 5.0), changes in stool consistency (#12, average rating 4.5), and more frequent bowel movements (#14, average rating 4.5).
- * Describing GI effects in terms of digestive “changes” (#13, average rating 4.5) and digestive “symptoms” (#15, average rating 4.4) resulted in a greater perception of safety than digestive “effects” (#18, average rating 4.1).

Approach D: Current label GI symptom information (e.g., Statements # 17, 20)

- * GI statements from the current interim label (#17, loose stools and #20, abdominal cramping) were rated low at average rating 4.2 and average rating 3.8, respectively, and are in the bottom tier.

Approach E: Adding context to qualify/describe GI symptoms (e.g., Statements # 8, 9, 10)

- * Adding context to GI symptoms such as “any changes are mild” (#8, average rating 5.3), “for some people” (#9, average rating 5.1) or “any changes are temporary” (#10, average rating 5.1) resulted in a greater perception of safety than only stating “digestive changes” (#13, average rating 4.5).

Conclusions:

The consumers’ perception of the degree of safety of olestra snacks after viewing the alternative GI statements ranged from 3.8 to 6.8 out of a possible 9 rating score. Statements that GI symptoms were not a likely consequence or that provided a familiar frame of reference resulted in a greater perception of safety than those that provided generalized GI symptom data or context to qualify or describe the GI symptoms. Those that resulted in the lowest perception of safety were statements that specified GI symptoms, including those that are in the current interim label (i.e., loose stools and abdominal cramping).

• Phase 2: Alternative Olestra Label Testing

Based on results from the Phase 1 testing, several alternative olestra labels were developed and then tested more extensively with consumers. While Phase 1 exploratory research involved testing a variety of GI statements (some statements were consistent with the olestra clinical GI database and some statements were not consistent), Phase 2 alternate labels were developed using only GI language that P&G judged to be consistent with the olestra clinical GI database. (NOTE: One exception is Alternative Label Study #3, where “laxative effect” wording was tested to determine how bottom tier GI language would be perceived by consumers in more extensive testing.) Results from testing of several of these labels in Alternative Olestra Label Studies #1, #2, and #3 are discussed below.

Alternative Olestra Label Study #1

Background:

An alternative label was developed that included GI language comparing digestive changes to those from other foods (top tier statement #4 from Table 2) in combination with other GI language. The GI portion of the current olestra label was used as a control. Vitamin language was not included in the alternative label or the control label in order to focus on understanding consumer perception of olestra snacks based only on GI label wording. Details of this study are presented in Appendix 3.

Labels Tested:

Each consumer was shown one of the following labels:

A. Current Olestra Label -- GI portion only (control):

This Product Contains Olestra. Olestra may cause abdominal cramping and loose stools.

B. Alternative Label:

As with other foods, excess consumption of salted snacks containing olestra may cause digestive changes for some people.

Results:

Results from this study are shown in Table 3. The alternative GI label, which included language that Phase 1 exploratory testing results suggested should have been more likely to correctly inform the consumer, resulted in about 1 in 4 consumers (27%) responding that olestra snacks were unsafe after reading it and about 1 in 3 consumers (30%) saying they would avoid olestra snacks. This is not significantly different than the safety perception (34% unsafe) and product avoidance (41% would avoid) of consumers who read the current olestra label.

Table 3: Alternative Olestra Label Study #1

Label Wording	<u>Current Olestra Label:</u>	<u>Alternative Label:</u>
	Loose Stools / Abdominal Cramping	As with Other Foods / Excess Consumption / Some People
	A	B
base size -	(105)	(105)
% Product is Unsafe	34	27
% Would Avoid Product	41	30
% Would Expect Symptoms	79	72
% Expect Diarrhea	30	27
% Expect Loose Stools	49 B	30
% Expect Cramping	60 B	37

Columns A/B tested for significant differences at 90% confidence level. Significant differences between column data are indicated by listing the column label (A or B) of the smaller column beside the data in the larger column.

Three out of 4 consumers (72%) who read the alternative label expected one or more GI symptoms after eating olestra snacks. Approximately 1 in 3 consumers answering this question still expected each of the GI symptoms of diarrhea, loose stools, and cramping. In absolute terms, the alternative label reduced consumer expectations regarding loose stools and cramping compared to the current label.

Conclusions:

The alternative GI label, which included GI language that had a better safety perception than the current label, was still misleading to consumers because after reading it almost 1 in 3 consumers thought olestra snacks are unsafe, almost 1 in 3 consumers would avoid the product, and about 3 in 4 consumers would expect GI symptoms from eating olestra snacks.

Alternative Olestra Label Study #2

Background:

Two alternative labels were developed for this test. One alternative label included, in combination with other GI language, top tier GI language stating that the digestive changes which may result from eating olestra snacks are similar to what some people experience from eating high fiber foods (top tier statement #6 from Table 2). The other alternative label did not include the GI language related to high fiber foods. Both alternate labels included vitamin information ("Not a nutritionally significant source") as an asterisked footnote in the ingredient statement, and information describing what olestra is (fat-free, no calorie cooking oil) and advising consumers where they could obtain additional product information (1-800#, web address). The current olestra label was used as a control. Details for this study are presented in Appendix 4. Results from the portion of the study related to the asterisking of the vitamins are presented in Section 4 (page 15).

Labels Tested:

Each consumer was shown one of the following labels:

A. Current Olestra Label (control):

This Product Contains Olestra. Olestra may cause abdominal cramping and loose stools. Olestra inhibits the absorption of some vitamins and other nutrients. Vitamins A, D, E, and K have been added.

B. Alternative Label (including top tier GI language regarding fiber):

Olestra is a fat-free, no calorie cooking oil. While most people will not be affected, excess consumption of olestra may result in digestive changes which are similar to what some people experience from eating high fiber foods.

More information can be obtained by calling 1-800-OLESTRA or at www.olestra.com.

Ingredients: Potatoes, Olestra, Salt, alpha-Tocopheryl Acetate (Vitamin E*), Vitamin A Palmitate*, Vitamin K*, Vitamin D*

*Not a nutritionally significant source

C. Alternative Label (without top tier GI language regarding fiber):

Olestra is a fat-free, no calorie cooking oil. While most people will not be affected, excess consumption of olestra may result in digestive changes.

More information can be obtained by calling
1-800-OLESTRA or at www.olestra.com.

Ingredients: Potatoes, Olestra, Salt, alpha-Tocopheryl Acetate (Vitamin E*), Vitamin A Palmitate*, Vitamin K*, Vitamin D*

*Not a nutritionally significant source

Results:

Results from this study are shown in Table 4. With respect to alternative label B (including fiber reference), 20-26% of consumers tested perceived that the label was a warning, that the product was unsafe, that the government was telling them that the product was unsafe, and that they would avoid the product. Five of 6 consumers (84%) who read alternative label B expected one or more GI symptoms after eating olestra snacks, and approximately 1 in 3 expected to experience diarrhea, loose stools, and cramping.

Similar results were seen with alternative label C (no fiber reference). Twenty-eight to 38% of consumers tested perceived that the label was a warning, that the product was unsafe, that the government was telling them that the product was unsafe, and that they would avoid the product. Four of 5 consumers (80%) who read alternative label C expected one or more GI symptoms after eating olestra snacks. Approximately 1 of 3 consumers expected to experience loose stools

and cramping, and nearly one-half expected to experience diarrhea after eating snack containing olestra. In the absolute, both alternative labels improved consumers' perception of olestra product safety, but did not reduce the percentage of consumers that expected one or more GI symptoms after eating olestra snacks.

Table 4: Alternative Olestra Label Study #2

Label Wording	<u>Current Olestra Label:</u> Loose Stools / Abdominal Cramping	<u>Alternative Label:</u> High Fiber / Excess Consumption / Some People	<u>Alternative Label:</u> Excess Consumption/ Digestive Changes / Some People
	A base size - (106)	B (110)	C (103)
% Warning Label	42 BC	22	28
% Product is Unsafe	45 BC	21	26
% Gov't Saying Product is Unsafe	48 BC	20	30 B
% Would Avoid Product	52 BC	26	38 B
% Would Expect Symptoms	88	84	80
% Expect Diarrhea	42 B	30	45 B
% Expect Loose Stools	62 BC	37	32
% Expect Cramping	60 BC	34	31

Columns A/B/C tested for significant differences at 90% confidence level. Significant differences between column data are indicated by listing the column label (A, B, or C) of the smaller column beside the data in the larger column.

Conclusions:

Both alternative olestra labels tested were misleading to consumers because a significant proportion still consider the products unsafe, would avoid the product, and would expect GI symptoms that have previously been shown not to be associated with the consumption of the product.

Alternative Olestra Label Study #3

Background:

An alternative label was developed that included GI wording that was similar to label wording required for sorbitol-containing products. While the "laxative effect" language is not consistent with the olestra GI clinical database, this wording was tested to gain understanding of consumer perception of bottom tier GI wording (bottom tier statement #19 from Table 2). The current olestra label was used as a control. Details of this study are presented in Appendix 5.

Labels Tested:

Each consumer was shown one of the following labels:

A. Current Olestra Label (control):

This Product Contains Olestra. Olestra may cause abdominal cramping and loose stools. Olestra inhibits the absorption of some vitamins and other nutrients. Vitamins A, D, E, and K have been added.

B. Alternative Label:

This Product Contains Olestra. Excess consumption may cause a laxative effect.

Results:

Results from this study are shown in Table 5. After reading this alternative label, almost one-half of consumers (46%) thought the label was a warning label, 27% thought olestra snacks were unsafe, and over one-third (39%) would avoid olestra snacks.

Table 5: Alternative Olestra Label Study #3

Label Wording	<u>Current Olestra Label:</u>	<u>Alternative Label:</u>
	Loose Stools / Abdominal Cramping	Excess Consumption / Laxative Effect
	A	B
base size -	(85)	(82)
% Warning Label	52	46
% Product is Unsafe	38	27
% Gov't Saying Product Unsafe	40 B	26
% Would Avoid Product	38	39
% Would Expect Symptoms	78	82
% Expect Diarrhea	32	50 A
% Expect Loose Stools	61	51
% Expect Cramping	53 B	29

Columns A/B tested for significant differences at 90% confidence level. Significant differences between column data are indicated by listing the column label (A or B) of the smaller column beside the data in the larger column.

Regarding GI symptoms, the majority of consumers (82%) who read the alternative label expected one or more GI symptoms after eating olestra snacks. Significantly more consumers who read the alternative label expected diarrhea (50% vs. 32%) compared to the current olestra label. Over one-half of the consumers who read the alternative and current olestra labels (51% and 61%, respectively) expected loose stools after eating olestra snacks. Fewer consumers who read this alternative label expected cramping compared to the current label, but 29% of consumers expected this symptom.

Conclusions:

The alternative GI label which included wording that was among the least likely to convey a high degree of product safety (from the bottom tier of the statement rating) was misleading because almost one-half of consumers thought it was a warning, one-fourth thought the product was unsafe, over one-third would avoid the product after reading it, and the majority of consumers expected GI symptoms from eating olestra snacks, with one-half specifically expecting loose stools or diarrhea, and more than one-fourth expecting cramping.

Overall Conclusion from Studies #1, 2, and 3:

All alternative labels tested still resulted in a significant proportion of consumers who believed the product was not safe, and that they would expect to experience one or more GI effects after eating olestra snacks.

The qualitative and quantitative consumer research conducted since 1996 on olestra labeling supports the conclusion that any GI information label on olestra snacks will likely be misleading because special labeling on olestra snacks suggests to consumers they are being warned that olestra is not safe. Accurate and truthful consumer perception of the safety of olestra snacks is not likely to be achieved when olestra snacks carry a GI information label - the two conditions are conflicting and thus are mutually exclusive.

4. ASTERISKING VITAMINS IN THE INGREDIENT STATEMENT

Background:

The objective of this study was to determine whether asterisking the vitamins with a statement such as "Not a nutritionally significant source" improved consumer understanding of the vitamin and nutrient interactions related to eating olestra snacks and, thereby, meeting FDA's original intention of ensuring that consumers were not misled by the addition of the fat soluble vitamins. Vitamin and other nutrients language present in the current label was removed. Alternative labels B and C tested in this study are identical with respect to the asterisking portion of the label, and vary only in the GI statement portion of the label which was discussed in Section 3, Study #2 (page 10). The current olestra label was used as a control. Details of this study are presented in Appendix 4.

Labels Tested:

Each consumer was shown one of the following labels:

A. Current Olestra Label (control):

This Product Contains Olestra. Olestra may cause abdominal cramping and loose stools. Olestra inhibits the absorption of some vitamins and other nutrients. Vitamins A, D, E, and K have been added.

B. Alternative Label with GI Language 1:

Olestra is a fat-free, no calorie cooking oil. While most people will not be affected, excess consumption of olestra may result in digestive changes which are similar to what some people experience from eating high fiber foods.

More information can be obtained by calling 1-800-OLESTRA or at www.olestra.com.

Ingredients: Potatoes, Olestra, Salt, alpha-Tocopheryl Acetate (Vitamin E*), Vitamin A Palmitate*, Vitamin K*, Vitamin D*

*Not a nutritionally significant source

C. Alternative Label with GI Language 2:

Olestra is a fat-free, no calorie cooking oil. While most people will not be affected, excess consumption of olestra may result in digestive changes.

More information can be obtained by calling

1-800-OLESTRA or at www.olestra.com.

Ingredients: Potatoes, Olestra, Salt, alpha-Tocopheryl Acetate (Vitamin E*), Vitamin A Palmitate*, Vitamin K*, Vitamin D*

*Not a nutritionally significant source

Results:

Results from this study are shown in Table 6. Data show that the vast majority of consumers (>80%) who read the olestra label with asterisked vitamins and other nutrients language removed believed that levels of vitamins A, D, E and K and other nutrients would not change after eating snacks containing olestra.

Table 6: Alternative Label Testing - Asterisked Vitamins

<i>Expected changes in vitamin levels after eating olestra snack chips</i>	Current Olestra Label	Asterisked Vitamins GI Language 1	Asterisked Vitamins GI Language 2
	A	B	C
base size -	(106)	(110)	(103)
% No change in levels of Vitamins A, D, E, K	43	81 A	80 A
% No change in levels of other nutrients	60	81 A	88 A

Columns A/B/C tested for significant differences at 90% confidence level. Significant differences between column data are indicated by listing the column label (A, B, or C) of the smaller column beside the data in the larger column.

Conclusions:

Asterisking the vitamins in the ingredient statement with the statement "Not a nutritionally significant source," and removing the vitamin and other nutrients language from the label significantly improves consumers' understanding of vitamin and nutrient interactions related to eating olestra.

5. PRESENCE OF BOX AROUND LABEL

Background:

The objective of this study was to determine the effect of the box around the current olestra label on consumer perception of olestra snacks. Details of this study are presented in Appendix 6.

Labels Tested:

Each consumer was shown one of the following labels:

A. Current Olestra Label - Boxed (control):

This Product Contains Olestra. Olestra may cause abdominal cramping and loose stools. Olestra inhibits the absorption of some vitamins and other nutrients. Vitamins A, D, E, and K have been added.
--

B. Current Olestra Label - Not Boxed:

This Product Contains Olestra. Olestra may cause abdominal cramping and loose stools. Olestra inhibits the absorption of some vitamins and other nutrients. Vitamins A, D, E, and K have been added.

Results:

Results from this study are shown in Table 7. Testing of the current olestra label in boxed and unboxed configurations shows the label would cause nearly two-thirds of consumers to avoid olestra snacks or be unsure of whether they should avoid olestra snacks, regardless of whether the label was boxed or not.

Over one-half of the consumers thought olestra snacks were not safe to eat or were not sure of the safety of olestra snacks after reading the label, both when the current olestra label was boxed and unboxed.

Table 7: Testing of Current Olestra Label - Boxed & Not Boxed

	Current Olestra Label with Box	Current Olestra Label No Box
	A	B
base size -	(78)	(69)
Label would cause avoidance of olestra snacks		
% Yes	47	41
% Don't Know	<u>22</u>	<u>22</u>
% Yes + Don't Know	69	63
Olestra snacks safe to eat		
% No	13	10
% Don't Know	<u>49</u>	<u>45</u>
% No + Don't Know	62	55

Columns A/B tested for significant differences at 90% confidence level. Significant differences between column data are indicated by listing the column label (A or B) of the smaller column beside the data in the larger column.

Conclusions:

The current olestra label is misleading to the majority of consumers both when it is boxed and when it is not boxed.

Consumer Research on Olestra Labeling Appendices

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6	Testing of Current Olestra Label - Boxed & Not Boxed